

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

FOSSA LTD., ICELANDICPLUS LLC and
STEVEN BARLOW,
Plaintiffs,

v.

I JIAN LIN and
ENCOMPASS COMMUNICATIONS, INC.,
Defendants,

Case No. 1:16-cv-11914

**ASSENTED-TO MOTION TO CONTINUE
STATUS CONFERENCE SCHEDULED FOR
APRIL 7, 2017**

I JIAN LIN and
ENCOMPASS COMMUNICATIONS, INC.
Counterclaim-Plaintiffs,

v.

FOSSA LTD., ICELANDICPLUS LLC, STEVEN
BARLOW,
Counterclaim-Defendants,
and

VALENTIN DAVID GURVITZ, ESQ.,
BOSTON LAW GROUP, P.C., and SONYA
LIVSHITS

Additional Counterclaim-Defendants.

Defendants and Counterclaim-Plaintiffs I Jian Lin (“Lin”) and Encompass Communications, Inc. (“Encompass”) respectfully request that the Court reschedule the status conference that the Court has scheduled for April 7, 2017 at 2:00 p.m., per the Court’s Electronic Order dated March 31, 2017. As grounds for this request, Lin and Encompass state as follows.

In its Electronic Order, the Court set a status conference for April 7, 2017, at which it has required that Plaintiff Steven Barlow and Mr. Lin be present in person. Unfortunately, Mr. Lin is presently out of the country in Peru on a previously-scheduled trip that involves, *inter alia*, work for the Peruvian government, and is unable to return to the United States before April 7.

Undersigned counsel is presently working to determine mutually available dates on which all counsel and Mr. Barlow and Mr. Lin will be available and will provide the Court with those dates as soon as possible.

The undersigned is authorized to represent that counsel for Plaintiffs/Counterclaim-Defendants and for Additional Counterclaim-Defendants assents to this motion.

CONCLUSION

For the foregoing reasons, Lin and Encompass respectfully request that the Court cancel the status conference scheduled for April 7, 2017, and reschedule it after the undersigned has had the opportunity to provide a list of dates on which all counsel and Messrs. Barlow and Lin will be available.

Dated: April 4, 2017

Respectfully submitted,

/s/ Mitchell J. Matorin
Mitchell J. Matorin (BBO#649304)
Matorin Law Office, LLC
18 Grove Street, Suite 5
Wellesley, MA 02482
T: (781) 453-0100
F: (888) 628-6746
E: mmatorin@matorinlaw.com
*Counsel for Defendants and
Counterclaim-Plaintiffs I Jian Lin and
Encompass Communications, Inc.*

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on April 4, 2017.

/s/ Mitchell J. Matorin